



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

APR 13 2016

REPLY TO THE ATTENTION OF:

CERTIFIED MAIL 7009 1680 0000 7669 2021
RETURN RECEIPT REQUESTED

Mr. Roy G. Elamana
Executive Vice President
Circuit Engineering, LLC
1390 Lunt Avenue
Elk Grove Village, Illinois 60007

Re: Notice of Violation
Compliance Evaluation Inspection
ILD 074 367 251

Dear Mr. Elamana:

On July 17, 2015 a representative of the U.S. Environmental Protection Agency inspected the Circuit Engineering, LLC (Circuit) facility located in Elk Grove Village, Illinois. As a large quantity generator of hazardous waste, Circuit is subject to the Resource Conservation and Recovery Act, 42 U.S.C. §§ 6901 *et seq.* (RCRA). The purpose of the inspection was to evaluate Circuit's compliance with certain provisions of RCRA and its implementing regulations related to the generation, treatment and storage of hazardous waste. A copy of the inspection report is enclosed for your reference.

Based on information provided by Circuit, EPA's review of records pertaining to Circuit, and the inspector's observations, EPA has determined that Circuit has unlawfully stored hazardous waste without a permit or interim status as a result of Circuit's failure to comply with certain conditions for a permit exemption under 35 Illinois Administrative Code (IAC) §§ 722.134(a)-(c) [see also 40 C.F.R. §§ 262.34(a)-(c)]. EPA has determined that, at the time of the inspection, Circuit was out of compliance with the following large quantity generator permit exemption conditions, as described in paragraphs 1-5, below. EPA has also determined that Circuit was not complying with a certain hazardous waste manifest reporting requirement, as described in paragraph 6, below.

STORAGE OF HAZARDOUS WASTE WITHOUT A PERMIT OR INTERIM STATUS

1. Date When Each Period of Accumulation Begins

Under 35 IAC § 722.134(a)(2) [see also 40 C.F.R. § 262.34(a)(2)], a large quantity generator must clearly mark each container holding hazardous waste with the date upon which each period of accumulation begins.

At the time of the inspection, Circuit was accumulating five containers of hazardous waste without the accumulation start dates.

2. Hazardous Waste Container and Tank Labeling

Under 35 IAC § 722.134(a)(3) [see also 40 C.F.R. § 262.34(a)(3)], a large quantity generator must label or clearly mark each container and tank holding hazardous waste with the words "Hazardous Waste."

At the time of the inspection, Circuit was accumulating hazardous waste in five containers and three hazardous waste storage tanks without the words "Hazardous Waste."

STORAGE OF HAZARDOUS WASTE WITHOUT A PERMIT OR INTERIM STATUS AND VIOLATIONS OF TSD REQUIREMENTS

Many of the conditions for a RCRA permit exemption are also independent requirements that apply to permitted and interim status hazardous waste management facilities that treat, store, or dispose of hazardous waste (TSD requirements). When a hazardous waste generator loses its permit exemption due to a failure to comply with an exemption condition incorporated from 35 IAC Part 725, the generator: (a) becomes an operator of a hazardous waste storage facility; and (b) simultaneously violates the corresponding TSD requirement. The exemption conditions identified in paragraphs 3-5 are also independent TSD requirements incorporated from 35 IAC Part 725. Accordingly, each failure by Circuit to comply with these conditions is also a violation of the corresponding requirement in 35 IAC Part 725 [see also 40 C.F.R. Part 265].

3. Hazardous Waste Storage Tank Requirements

Under 35 IAC §§ 722.134(a)(1)(ii) and 725.292 [see also 40 C.F.R. §§ 262.34(a)(1)(ii) and 265.192], a large quantity generator must obtain and keep on file at the facility a written Tank System Certification for each hazardous waste storage tank.

At the time of the inspection, Circuit did not have a written Certification available for three hazardous waste storage tanks for review to determine if the foundation, structural support, seams, connections, and pressure controls (if applicable) are adequately designed and that the tank system has sufficient structural strength, compatibility with the waste being stored or treated, and corrosion protection so that it will not collapse, rupture, or fail.

Under 35 IAC § 722.134(a)(1)(ii) and 35 IAC § 725.295 [see also 40 C.F.R. §§ 262.34(a)(1)(ii) and 265.195], a large quantity generator of hazardous waste must inspect

each tank system at least once each operating day and document the inspections in the operating record of the facility.

At the time of the inspection, Circuit was not maintaining records of daily tank system inspections.

4. Personnel Training

A large quantity generator of hazardous waste must have a program of classroom instruction or on-the-job training that teaches facility personnel to perform their duties in a way that ensures the facility's compliance with requirements of RCRA. This program must be directed by a person trained in hazardous waste management procedures, and must include instruction that teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed. *See* 35 IAC §§ 722.134(a)(4) and 725.116(a) [see also 40 C.F.R. §§ 262.34(a)(4) and 265.16(a)]. Facility personnel must successfully complete this training program within six months after the date of their employment or assignment to a facility or to a new position at a facility, and must take part in an annual review of this initial training thereafter. *See* 35 IAC §§ 722.134(a)(4) and 725.116(b) and (c) [see also 40 C.F.R. §§ 262.34(a)(4) and 265.16(b) and (c)].

With respect to this training program, a large quantity generator must maintain the following documents and records at its facility:

- 1) The job title for each position at the facility related to hazardous waste management and the name of the employee filling each job;
- 2) A written job description for each position at the facility related to hazardous waste management;
- 3) A written description of the type and amount of both introductory and continuing training that will be given to each person filling a position at the facility related to hazardous waste management; and
- 4) Records that document that the training or job experience described above has been given to and completed by facility personnel. *See* 35 IAC §§ 722.134(a)(4) and 725.116(d) [see also 40 C.F.R. §§ 262.34(a)(4) and 265.16(d)].

At the time of the inspection, Circuit did not have a list of each position at the facility related to hazardous waste management and the name of the employee filling such positions.

At the time of the inspection, Circuit did not have a written description of the type and amount of introductory and continuing training given to employees with duties related to hazardous waste management.

At the time of the inspection, Circuit did not have training records for two facility employees (Mr. Jose Hernandez and Mr. Bhavesh Mehta) for years 2012-2015.

5. Container Requirements

Under 35 IAC §§ 722.134(a)(1)(i) and 725.274 [see also 40 C.F.R. §§ 262.34(a)(1)(i) and 265.174], a large quantity generator must inspect, at least weekly, areas where hazardous waste containers are stored. The owner or operator must look for leaking containers and deterioration of containers.

At the time of the inspection, Circuit was not inspecting the containers holding hazardous waste in the less than 90-day storage area.

By failing to comply with the conditions for a permit exemption, above, Circuit became an operator of a hazardous waste storage facility, and was required to obtain an Illinois hazardous waste storage permit. Circuit failed to apply for such a permit. Circuit's failure to apply for and obtain a hazardous waste storage permit violated the requirements of 35 IAC §§ 703.121(a) and (b), 703.180(c), and 705.121(a) [see also 40 C.F.R. §§ 270.1(c), and 270.10(a) and (d)]. Any failure to comply with a permit exemption condition incorporated from 35 IAC Part 725 [see also 40 C.F.R. Part 265] is also an independent violation of the corresponding TSD requirement.

At this time, EPA is not requiring Circuit to apply for an Illinois hazardous waste storage permit as long as it immediately establishes compliance with the conditions for a permit exemption outlined in paragraphs 1-5, above.

HAZARDOUS WASTE RECORDKEEPING AND REPORTING

Finally, EPA has also determined that Circuit violated a RCRA requirement related to recordkeeping and reporting, as described in paragraph 6, below.

6. Hazardous Waste Manifest Exception Reporting

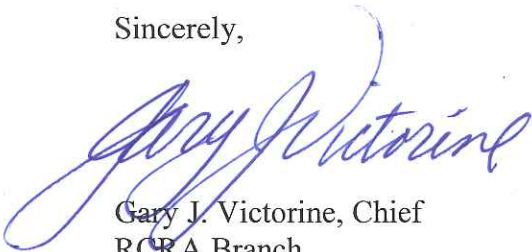
Under 35 IAC § 722.142(a)(2), a large quantity generator that ships any hazardous waste off-site to a treatment, storage or disposal facility (TSDF) must submit an Exception Report to the Illinois Environmental Protection Agency if the generator does not receive a copy of the manifest with the handwritten signature of the owner or operator of the TSDF within 45 days of the date the waste was accepted by the initial transporter.

At the time of the inspection, Circuit did not have Exception Reports for seven hazardous waste manifests for waste shipped offsite during calendar year 2013 that did not have a copy of the manifest with the handwritten signature of the owner or operator of the TSDF.

According to Section 3008(a) of RCRA, EPA may still issue an order assessing a civil penalty for any past or current violation, requiring compliance immediately or within a specified time period, or both. Although this letter is not such an order or a request for information under Section 3007 of RCRA, 42 U.S.C. § 6927, we request that you submit a response in writing to us no later than 30 days after receipt of this letter documenting the actions, if any, you have taken since the inspection to establish compliance with the above exemption conditions described in paragraphs 1-5, and the recordkeeping and reporting requirement described in paragraph 6. You should submit your response to: Graciela Scambiaterra, of my staff, at: U.S. EPA, Region 5, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604.

If you have any questions regarding this letter, please contact Ms. Scambiaterra at 312-353-5103 or at scambiaterra.graciela@epa.gov.

Sincerely,



Gary J. Victorine, Chief
RCRA Branch

Enclosure

cc: Todd Marvel, Illinois Environmental Protection Agency (todd.marvel@illinois.gov)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
LAND AND CHEMICALS DIVISION, RCRA BRANCH
77 W. JACKSON BOULEVARD
CHICAGO, IL 60604

COMPLIANCE EVALUATION INSPECTION REPORT

INSTALLATION NAME: Circuit Engineering, LLC

EPA ID No.: ILD 074 367 251

LOCATION ADDRESS: 1390 Lunt Avenue
Elk Grove Village, Illinois 60007

NAICS CODE(s): 332813 [Electroplating, Plating, Polishing, Anodizing, and Coloring]

DATE OF INSPECTION: July 17, 2015

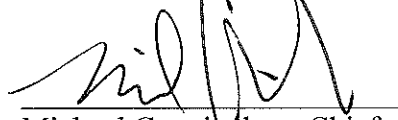
U.S. EPA INSPECTOR(s): Graciela Scambiatterra

PREPARED BY:


Graciela Scambiatterra
Environmental Scientist

10/22/2015
Date

APPROVED BY:


Michael Cunningham, Chief
Compliance Section 1
RCRA Branch
Land and Chemicals Division

10/22/15
Date

RCRA Compliance Evaluation Inspection

Introduction

I, Graciela Scambiaterra, Environmental Scientist, from the United States Environmental Protection Agency (EPA) conducted a hazardous waste compliance evaluation inspection (CEI) at Circuit Engineering, LLC (Circuit), located at 1390 Lunt Avenue, Elk Grove Village. The Purpose of the CEI was to evaluate Circuit's compliance with certain provisions of the Resource Conservation and Recovery Act (RCRA), specifically, those regulations related to the management and disposal of hazardous waste.

Photographs (photos) taken during the inspection are included in Attachment 1.

History and Interview

I arrived at Circuit on July 17, 2015 at approximately 9:00 a.m., identified myself and provided my credentials to Roy G. Elamana, Executive Vice President. He escorted me to the office area where I conducted the opening interview. The following individuals were present during the CEI:

NAME	TITLE	EMPLOYER
Gracie Scambiaterra	Environmental Scientist	U.S. EPA
Roy G. Elamana	Executive Vice President	Circuit
Dileep Thomas	Quality Assurance & Operations Manager	Circuit

Once we were in the office area, I held an opening conference with Mr. Elamana and Mr. Thomas. I explained to them my purpose for being at the facility; and that I would be performing a records review and a physical site inspection of the facility, including taking photographs. Our discussion included confidential business information (CBI). I informed them that if they or any other Circuit employees were going to disclose CBI, I should be informed immediately in order for me to handle that material and/or information in accordance with EPA policy. I informed the Circuit representatives that I would be reviewing the following records:

1. RCRA training records from January 2013 until the present.
2. Hazardous Waste Annual Reports for years 2012 – 2014.
3. Hazardous Waste Manifests for waste sent offsite from January 2013 until the present.
4. RCRA Contingency Plan.
5. Tank Assessment for each Hazardous Waste Storage Tank.
6. Daily tank inspections for each Hazardous Waste Storage from January 2013 until the present.
7. Weekly container inspections for the less than 90-day storage area from January 2013 until the present.

Mr. Elamana provided a brief history of the facility. Circuit has been operating at this location since approximately October 2006 when they purchased the facility from the previous owner, QMA, Inc. Circuit has approximately 35 employees at this location and operates one shift daily, Monday through Friday.

Circuit manufactures circuit boards involving plating as part of the process. Copper and tin plating, as well as etching, are some of the processes involved in making the circuit boards. Raw materials are purchased and brought into the facility.

When Circuit purchased the facility from QMA, Inc., they removed the pre-treatment tanks from the onsite waste water treatment system (WWTS). Now, Circuit only uses this area, called the “holding tank area,” for collecting corrosive plating bath rinse waste in a holding tank before it is pumped to one of two Hazardous Waste Storage Tanks.

According to Mr. Elamana, Circuit was undergoing an upgrade of their facility. The facility was changing from manual plating equipment to a fully automated system.

According to the RCRAInfo database, Circuit has provided notifications that it has been operating as a large quantity generator (LQG) of hazardous waste since on or about March 1, 2008.

I provided the Small Business Resources Guide to Mr. Elamana.

I explained to Mr. Elamana and Mr. Thomas that I would be conducting the physical site inspection portion first, followed by the records review.

Site Inspection

The Circuit site inspection began at approximately 10:20 a.m. I was escorted by Mr. Thomas. I asked Mr. Thomas to take me through the facility according to the processing of the circuit boards, from start to finish.

Engineering Department/Office Area:

Our first stop was the Engineering Department. This area is where information from each customer is received, processed and a custom job is created. Circuit utilizes computer-aided manufacturing (CAM) software. Once a custom job has been created, it is sent to the drilling department for processing.

Drilling Department:

Drilling receives the custom job and panels, used for the circuit boards, are brought here from the materials storage area. The physical process of creating the circuit boards starts here. The panels are drilled according to each job specification.

Plating Area (1st Copper line):

Once the panels have been drilled, they are brought to the plating area and undergo copper plating in Copper Line #1. This line contains several plating, rinse, and two acidic baths.

Artwork/Graphic Art/Imaging:

We continued our walk through the facility and arrived at the Artwork/Graphic Art/Imaging area. Once the newly plated panel arrives here, a laminate is applied, then a photographic film. The photographic film consists of the specific artwork for that particular custom job.

Developing Room:

The next process involves image developing. Some panels come here, and others undergo Liquid Photo Image (LPI) processing (see below). The panels are processed through a machine containing a developing solution. A 55-gallon container of developer solution waste was being accumulated in the area (see photo 1). I asked to see the developer solution Circuit was using and Mr. Thomas showed me the container of material (see photo #2 of the developer solution label).

Liquid Photo Image (LPI):

This area also utilizes the developer solution in their imaging process. Mr. Thomas informed me that the waste generated from the developing process gets discharged to the local Metropolitan Water Reclamation District of Greater Chicago (MWRDGC).

Plating Area (2nd Copper Line):

Our inspection of the facility continued into the plating area, Copper Line #2. Mr. Thomas informed me that only panels from the Developing Room come to be plated here. Additional plating and copper is applied here to expose more of the copper. Tin plating is used to protect the copper. This line also contains several plating, rinse, and acidic baths. The panels that undergo LPI are not plated in Copper Line #2.

Etching/Stripping Line:

A copper (alkaline) etchant and tin (acidic) stripper are used here on the panels.

Scrubbing Area:

This area involves physical scrubbing of the panels with a copper scrubbing mixture.

Screening Area:

The Screening Area uses a solvent on the panels.

Solder Area:

The next area we inspected was the Solder Area. Here, panels are put through a pre-clean machine, flux is then added and then the panel is put through a solder machine at 500°F. Afterwards, the panel is soaked in water for cleaning. The panels are coated with another solvent layer in the Screening Area prior to the Final Bake.

Final Bake:

The panels arrive here and are baked in an oven at 350°F.

Final Fabrication:

The Final Fabrication area, consisting of four machines, is where the finished panels, or circuit boards, are cut to size.

Electrical Test Area:

This area is for Quality Assurance/Quality Check (QA/QC) of the circuit boards.

Final Inspection Area:

Here, final inspection of the circuit boards consists of looking for slight imperfections.

Shipping Area:

Packaging of the final product and shipping to the customer.

Holding Tank Area:

Mr. Thomas escorted me to the Holding Tank Area (*see* photos 3-4). The holding tank area consists of a holding tank that accumulates corrosive plating bath rinse waste (*see* photo 5) and a discharge area for waste discharge to the MWRDGC (*see* photo 6). I noted the area had a sign that read "Satellite Waste Holding Tank." Mr. Thomas informed me that the holding tank (plating rinse waste) was cylinder in shape and he believed it measured three feet deep and three feet in diameter. I noted this tank was full. I asked Mr. Thomas if Circuit had a tank assessment for the holding tank and he replied that to his knowledge, there was not one for the tank.

Hazardous Waste Storage Tank Area:

The Hazardous Waste Storage Tank Area was near the Holding Tank Area. I observed two tanks. The first was labeled “Satellite Waste Holding Tank” (see photo 7). The second tank was not labeled (see photos 8-9). Both tanks were full. I asked about tank assessments for both tanks and I was informed that Circuit had not obtained one for each tank. Mr. Thomas and Gibson Thorakkal, Circuit employees, informed me that the tank valve had been manually turned off since both tanks were full. Once the tanks reach full capacity, plating rinse waste from the Holding Tank Area will be placed in 55-gallon containers for storage. I noted five 55-gallon containers with the corrosive plating rinse waste (see photos 10-11). None of these containers had any labeling or markings and were not dated with an accumulation start date. Additional empty 55-gallon containers were in the area that are designated to be filled with the corrosive plating waste until such time that the Hazardous Waste Storage Tanks can be emptied and sent offsite for disposal.

I concluded the physical site inspection at approximately 11:35 a.m., at which time Mr. Thomas escorted me back to the office area so I could conduct the records review.

Mr. Elamana needed some time to gather the records I requested, therefore, we took a lunch break from 12:00 p.m. – 12:45 p.m.

Records Review

I began the record review at approximately 1:00 p.m.

Training

I asked Mr. Thomas and Mr. Elamana for job titles, job duties and descriptions for facility personnel with hazardous waste duties. They replied they did not have any. They also could not provide a syllabus for the training content below, nor a written training plan on the type and amount of training given to facility personnel.

Mr. Thomas began employment on 3/2/15. According to the “Training Details and Needs” document he provided for my review, Mr. Thomas had not received hazardous waste training.

Mr. Thomas provided for my review a document titled “3-year – Training Record.” I noted it contained the following:

- Mr. Gibson Thorakkal:
 - Hazardous Material Handling and August 2012 Emergency Response Plan awareness: 5/6/12, given by Bhavesh Mehta.
 - Hazardous Material Handling and August 2013 Emergency Response Plan awareness: 4/26/13, given by Bhavesh Mehta.

- Hazardous Material Handling and Emergency Response Plan awareness: 5/3/14, given by Bhavesh Mehta.
- Hazardous Material Handling and August 2012 Emergency Response Plan awareness: 3/10/15, given by Bhavesh Mehta.
- Jose Hernandez: Training included performance of the new process for CTS jobs (6/10/11). No other training was found in folder “Training Details and Training Plan” for Mr. Hernandez. I pointed this out to Mr. Elamana and Mr. Thomas and they replied that they had no other training records for Mr. Hernandez.

I asked to see Bhavesh Mehta’s training records since he had been providing training for Circuit’s employees. According to Mr. Elamana, Mr. Mehta had left the company about a year ago and Circuit did not have any training records for Mr. Mehta. I was also informed that Mr. Mehta did not have a training syllabus and had provided training without it. I noticed that the most recent training provided for Mr. Thorakkal on 3/10/15 (see above) was given by Mr. Mehta, even though he wasn’t an employee of Circuit. I was informed that even though Mr. Mehta had not been officially employed by Circuit at that time, he had returned to the facility to provide this training.

Manifests/LDRs

Mr. Elamana provided me, for my review, hazardous waste manifest from December 2013 until the date of the inspection. I asked about the remaining hazardous waste manifests for calendar year 2013 and Mr. Elamana informed me that he did not have them at the facility, but would provide them electronically in the near future. I reviewed the following:

Hazardous Waste Manifests				
Manifest Number	Waste Code(s)	Quantity (gallons)	Date	TSDF Signature?/ Signatory
014457226 JJK	D002	4550	7/6/15	Yes/Thomas
014456465 JJK	D002	4706	6/18/15	Yes/Thorakkal
014456038 JJK	D002	3350	6/1/15	No/Thorakkal
014455593 JJK	D002	4250	5/6/15	Yes/Thomas
013434355 JJK	D002	4565	4/20/15	Yes/Thorakkal
013303943 JJK	D002	5550	3/30/15	Yes/Elamana
013432868 JJK	D002	4565	3/23/15	Yes/Thorakkal
013303691 JJK	D002	1795	3/17/15	Yes/Thomas
013303617 JJK	D002	4565	3/12/15	Yes/Thorakkal
013432552 JJK	D002	4565	2/4/15	Yes/Mehta
013303246 JJK	D002	4075	1/19/15	Yes/Thorakkal
013433814 JJK	D002	4680	11/13/14	Yes/Mehta
012081841 JJK	D002	4400	10/29/14	Yes/Jose Hernandez
013434850 JJK	D002	3650	10/1/14	Yes/Thorakkal
013259076 JJK	D002, F006	605, 5 yd. bags	8/18/14	Yes/Thorakkal

013258794 JJK	D002	5100	7/31/14	Yes/Thorakkal
012038585 JJK	D002	3575	12/10/13	Yes/Mehta

The Treatment, Storage and Disposal Facility (TSDF), where all of the above hazardous waste was sent, is Envirite of Illinois (ILD000666206).

Contingency Plan

Mr. Elamana informed me that there had been a fire at the facility during February 2014. The plating lines were not operational until January 2015. According to Mr. Elamana, all hazardous waste that was generated between February 2014 and January 2015 was from cleaning and power washing of the facility.

Mr. Elamana provided me with Circuit's contingency plan for my review. I noted it contained the following:

- The plan was titled "Emergency Response and Spill Control Plan" and dated August 2009.
- Emergency Coordinator: Sue Pontanini, Sales Vice President. Phone (cell) number.
- Alternate Emergency Coordinator: Jomi Jacob, Q.C. Manager. Phone (cell) number.
- An Evacuation Plan.
- A floor plan with a map of emergency equipment.

Annual Reports

I asked Mr. Thomas and Mr. Elamana for the Hazardous Waste Annual Reports for years 2014, 2013 and 2012. None of the reports were available for my review at the time of the inspection. Mr. Elamana informed me he would provide them to me electronically in the near future.

Inspection Reports

I asked to review the daily inspections of the Hazardous Waste Storage Tanks and the inspections for the weekly less than 90-day containers for years 2015, 2014 and 2013. Mr. Thomas and Mr. Elamana informed me that written daily inspections of the Hazardous Waste Storage Tanks were not being conducted, nor were the weekly inspection for the less than 90-day containers.

Tank Assessments

During the physical site inspection I had asked Mr. Thomas about RCRA tank assessments for the three tanks being used as Hazardous Waste Storage Tanks at the facility. I asked Mr. Elamana during the records review and he replied the same as

Mr. Thomas. To his knowledge, none of the tanks had been certified with a tank assessment by a professional engineer.

I concluded Circuit's records review at approximately 2:45 p.m., at which time I prepared for the closing conference.

Closing Conference

I sat down with Mr. Elamana and Mr. Thomas to discuss the records review and the site inspection. The following topics were discussed:

1. Container issues:
 - a. None of the containers (five) were labeled.
 - b. None of the containers (five) were dated.
 - c. Containers were not being inspected weekly.
2. Training: we talked about missing records, job titles, job description and training plan.
3. Tank issues:
 - a. None of the tanks were labeled with the words "Hazardous Waste" (all three).
 - b. Missing tank assessments (all three).
 - c. Missing daily tank inspections (for all three).
4. Missing Hazardous Waste Annual Reports for years 2012, 2013 and 2014.
5. Missing Hazardous Waste Manifests for calendar year 2013.
6. One hazardous waste manifest did not have the final TSDF signature (#014456038 JJK).

I thanked Mr. Elamana and Mr. Thomas for their time. I explained that a thorough review would be completed and a compliance determination would be forthcoming.

I completed the CEI at approximately 3:15 p.m. and departed the facility.

ATTACHMENTS: (2)

Attachment 1	Photographs taken during the inspection
Attachment 2	Inspection checklist

ADDENDUM:

On July 17, 2015, July 20, 2015 and July 23, 2015, Circuit provided the following via email correspondence:

- Copies of the Hazardous Waste Annual Reports for years 2012, 2013 and 2014.
- Copy of the Hazardous Waste manifest #014456038 JJK with the final TSDF signature.

- Copies of the Hazardous Waste Manifests for calendar year 2013. However, the manifests were without the final TSDF signature.

Attachment 1

Circuit Engineering, LLC-RCRA ID: ILD 074 367 251

July 17, 2015

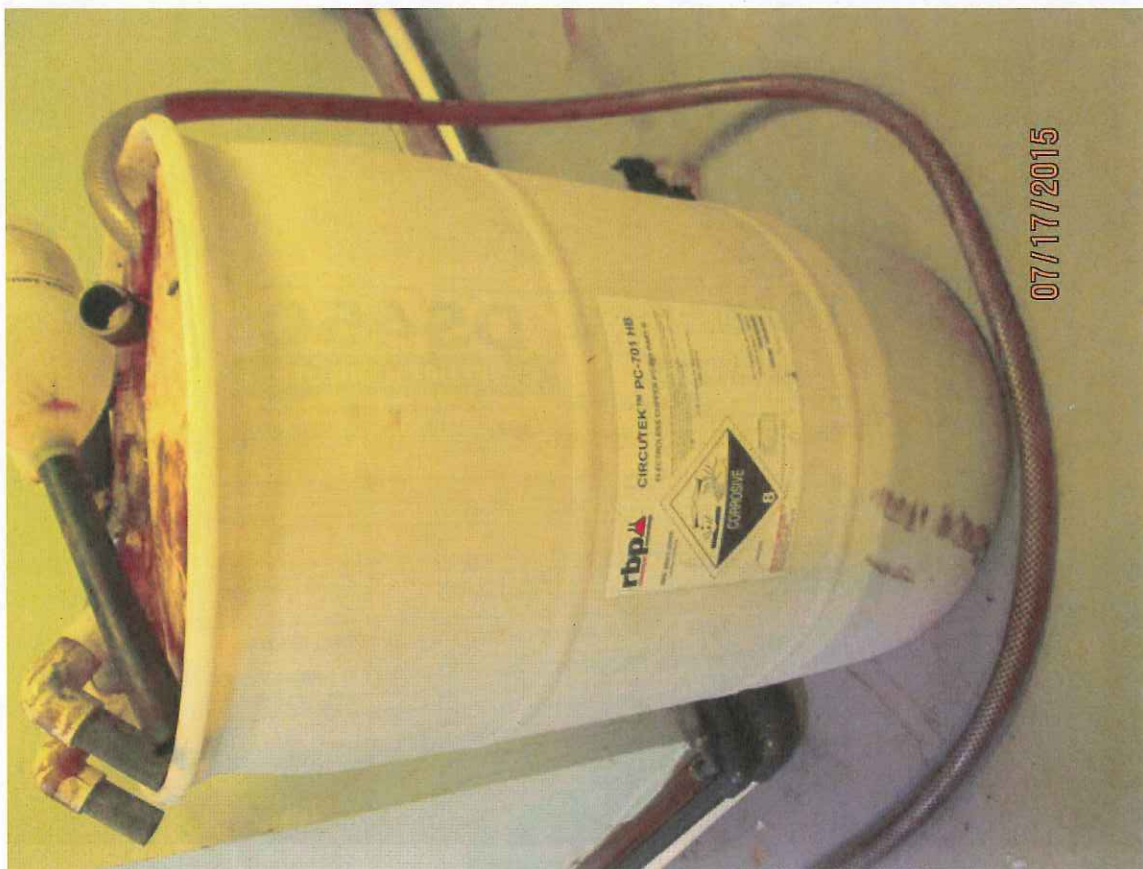


Photo 1. Photographer: G. Scambiatterra. Time: 10:43 a.m.

Description: 55-gallon container of developer waste from the Developing Room

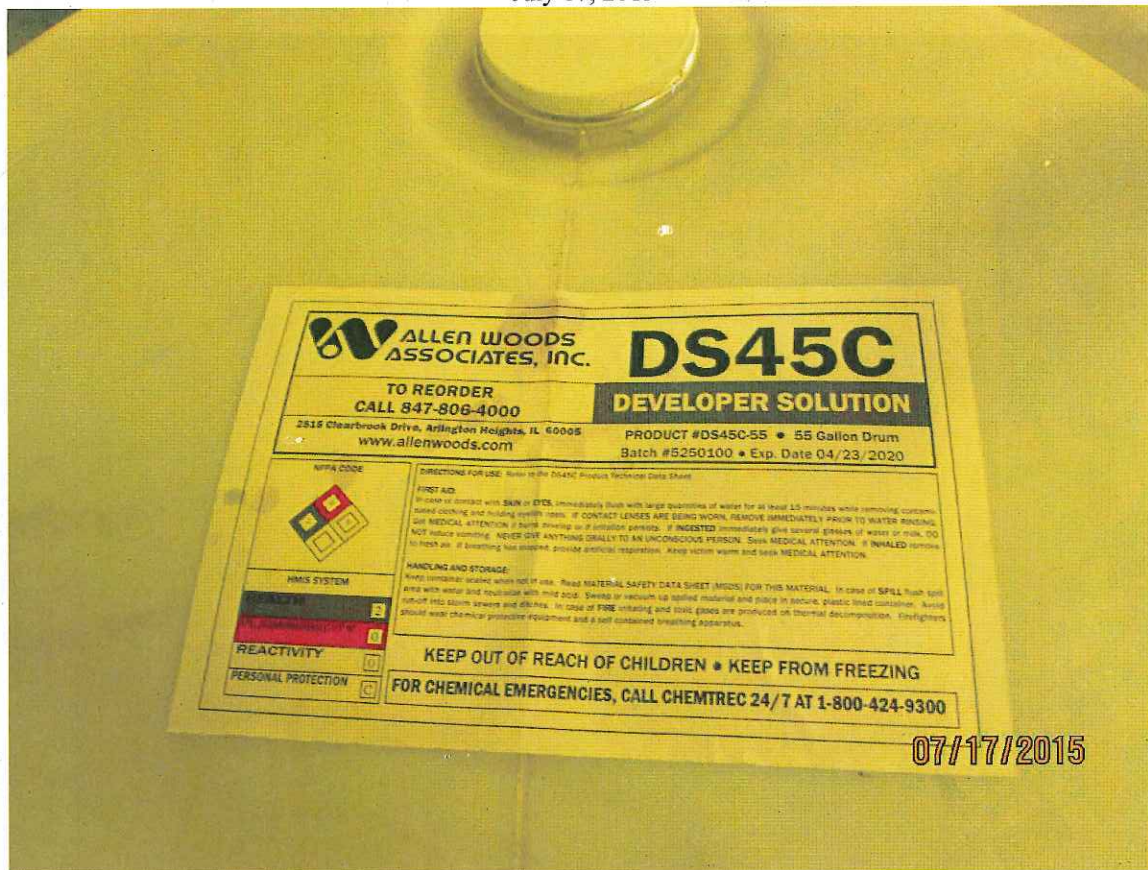


Photo 2. Photographer: G. Scambiaterra. Time: 10:43 a.m.
Description: Label of the Developer Solution used in the Developing Room

Attachment 1

Circuit Engineering, LLC-RCRA ID: ILD 074 367 251

July 17, 2015



Photo 3. Photographer: G. Scambiaterra. Time: 11:15 a.m.

Description: Holding Tank Area used to collect corrosive plating bath rinses (right side) and the discharge area to the local MWRDGC (left side). This area used to be a WWTS before the facility removed the pre-treatment tanks

Attachment 1

Circuit Engineering, LLC-RCRA ID: ILD 074 367 251

July 17, 2015



Photo 4. Photographer: G. Scambiaterra. Time: 11:16 a.m.

Description: Holding Tank Area used to collect corrosive plating bath rinses (right side) and the discharge area to the local MWRDGC (left side). This area used to be a WWTS before the facility removed the pre-treatment tanks

Attachment 1

Circuit Engineering, LLC-RCRA ID: ILD 074 367 251

July 17, 2015



Photo 5. Photographer: G. Scambiaterra. Time: 11:18 a.m.

Description: Holding Tank Area used to collect corrosive plating bath rinses. Tank is approximately 3'X3' and was full. Area labeled "Satellite Waste Holding Tank."

Attachment 1

Circuit Engineering, LLC-RCRA ID: ILD 074 367 251

July 17, 2015



Photo 6. Photographer: G. Scambiaterra. Time: 11:21 a.m.
Description: Holding Tank Area - discharge area to the local MWRDGC

Attachment 1

Circuit Engineering, LLC-RCRA ID: ILD 074 367 251
July 17, 2015



Photo 7. Photographer: G. Scambiatterra. Time: 11:25 a.m.
Description: Hazardous Waste Storage Tank Area – tank labeled “Satellite Waste Holding Tank” and was at full capacity

Attachment 1

Circuit Engineering, LLC-RCRA ID: ILD 074 367 251

July 17, 2015



Photo 8. Photographer: G. Scambiaterra. Time: 11:28 a.m.

Description: Hazardous Waste Storage Tank Area – tank not labeled and was at full capacity

Attachment 1

Circuit Engineering, LLC-RCRA ID: ILD 074 367 251

July 17, 2015



Photo 9. Photographer: G. Scambiaterra. Time: 11:28 a.m.

Description: Hazardous Waste Storage Tank Area – tank not labeled and was at full capacity (blinking red light indicates tanks are at full capacity, according to Mr. Thorakkal)

Attachment 1

Circuit Engineering, LLC-RCRA ID: ILD 074 367 251

July 17, 2015



Photo 10. Photographer: G. Scambiaterra. Time: 11:29 a.m.

Description: Hazardous Waste Storage Tank Area. Five 55-gallon containers had corrosive plating rinse waste. They were not labeled and were not dated. All five were full.

Attachment 1

Circuit Engineering, LLC-RCRA ID: ILD 074 367 251

July 17, 2015



Photo 11. Photographer: G. Scambiaterra. Time: 11:29 a.m.

Description: Hazardous Waste Storage Tank Area. Five 55-gallon containers had corrosive plating rinse waste. They were not labeled and were not dated. All five were full.

Installation Name:
Circuit Engineering, LLC
Date of Inspection:
July 15, 2015

Location Address:
1390 Lunt Ave, Elk Grove Village, IL
U.S. EPA Inspector:
Graciela Scambiaterra

EPA ID Number:
ILD 074 367 251

Attachment 2

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
	PART 722: STANDARDS APPLICABLE TO GENERATORS OF HAZARDOUS WASTE (>1000 KG/MO.)	
	SUBPART A: GENERAL	
	Section 722.111 Hazardous Waste Determination	
722.111	Has the generator correctly determined if the solid waste(s) it generates is a hazardous waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.111
	Have hazardous wastes been identified for purposes of compliance with Part 728? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
808.121(a)	Has the generator correctly determined if the solid waste(s) it generates is a special waste? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
	Section 722.112 USEPA Identification Numbers	
722.112(a)	Has the generator obtained a USEPA identification number? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	808.121(a) 722.112(a)
722.112(c)	Has the generator offered its hazardous waste only to transporters or to treatment, storage or disposal facilities that have a USEPA identification number? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.112(c)
	SUBPART B: THE MANIFEST	
	Section 722.120 General Requirements	
722.120(a)	Does the facility manifest its waste off-site? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
722.120(b)	Does the manifest designate a facility permitted to handle the waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.120(a)
722.120(d)	Has the generator shipped any waste that could not be delivered to the designated facility? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	722.120(b)
	Section 722.121 Acquisition of Manifests	
722.121(a)	Has the generator used: - an Illinois manifest for wastes designated to a facility within Illinois? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.120(d) 722.121(a)
722.121(b)	- a manifest from the State to which the manifest is designated? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - an Illinois manifest if the State to which the waste is designated has no manifest of its own? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.121(b)
	Section 722.122 Number of Copies	
722.122	Does the manifest consist of at least 6 copies? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.122
	Section 722.123 Use of the Manifest	
722.123(a)	For each manifest reviewed, has the generator: - signed the certificate by hand? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - obtained the handwritten signature and the date of acceptance by the initial transporter? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> - retained one copy as required by Section 722.140(a)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - apparently sent a copy (part 5 for the Illinois manifest) to the Agency within 2 working days? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.123(a)
722.123(b)	- has the generator apparently given the remaining copies to the transporter? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.123(b)

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722.123(e)	<p>- has the generator followed the procedures prescribed in Section 722.123 for manifesting bulk shipments of hazardous waste by rail or water?</p> <p>Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	722.123(c)
722.130	<p>SUBPART C: PRE-TRANSPORT REQUIREMENTS</p> <p>Is there any hazardous waste ready for transport off-site? <input checked="" type="checkbox"/></p> <p>Yes _____ No _____ N/A _____</p> <p>If so, is the generator complying with the pre-transport requirements in Subpart C?</p> <p>Yes _____ No <input checked="" type="checkbox"/> N/A _____</p>	722.130
(722.134(a))	<p>Section 722.134 Accumulation Time</p> <p>Has the generator complied with the following requirements:</p> <p>Yes _____ No _____ N/A _____</p>	
(722.134(a)(1))	<p>A) For waste in containers, has the generator complied with the requirements of Part 725, Subpart I, AA, BB, and CC?</p> <p>Yes _____ No _____ N/A _____</p> <p>and/or</p> <p>B) For waste in tanks, has the generator complied with the requirements of Part 725, Subpart J, AA, BB, and CC (except Sections 725.297(c) and 725.300)?</p> <p>Yes _____ No <input checked="" type="checkbox"/> N/A _____</p> <p>and/or</p> <p>C) For waste on drip pads, has the generator complied with the requirements of Part 725, Subpart W and maintained the required records identified in this subsection?</p> <p>Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>and/or</p> <p>D) For waste in containment buildings, has the generator complied with Part 725, Subpart DD and maintained the required records identified in this subsection?</p> <p>Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	
(722.134(a)(2))	<p>For waste in containers, has the generator marked and made visible for inspection on each container, the date upon which accumulation began?</p> <p>Yes _____ No _____ N/A _____</p>	
(722.134(a)(3))	<p>For waste in containers and tanks, has the generator marked or labeled each with the words "Hazardous Waste"?</p> <p>Yes _____ No _____ N/A _____</p>	
(722.134(a)(4))	<p>Has the generator complied with the requirements of Part 725, Subparts C and D, and Sections 725.116 and 728.107(a)(4)?</p> <p>Yes _____ No _____ N/A _____</p> <p>Specifically, the requirements of items 1 and/or 4 above (listed by regulation) which need to be complied with are as follows:</p> <p>Does the facility accumulate hazardous waste in containers?</p> <p>Yes _____ No _____ N/A _____</p> <p>If "No", go to Subpart J.</p>	
(725.211) (725.214)	<p>SUBPART I: USE AND MANAGEMENT OF CONTAINERS</p> <p>Has the generator closed an accumulation area?</p> <p>Yes _____ No _____ N/A _____</p> <p>If "Yes", was the accumulation area closed in accordance with Sections 725.211 and 725.214?</p> <p>Yes _____ No _____ N/A _____</p>	725.211 725.214

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(725.271)	If the containers have leaked or are in poor condition, has the owner/operator transferred the hazardous waste to a suitable container? Yes _____ No _____ N/A _____	
(725.272)	Is the waste compatible with the container and/or liner? Yes _____ No _____ N/A _____	
(725.273(a))	Are containers of hazardous waste always closed except to remove or add waste during accumulation? Yes _____ No _____ N/A _____	
(725.273(b))	Are containers of hazardous waste being opened, handled, or stored in a manner which will prevent the rupture of the container or prevent it from leaking? Yes _____ No _____ N/A _____	
(725.274)	Is the owner/operator inspecting the accumulation area(s) at least weekly, looking for leaks or deterioration? Yes _____ No _____ N/A _____ Is the accumulation area free from any evidence of leaking or deteriorating containers? (See also Section 725.131) Yes _____ No _____ N/A _____	
(725.276)	Are containers holding ignitable or reactive wastes located at least 15 meters (50 feet) from the facility's property line? Yes _____ No _____ N/A _____ Note: See Section 725.117(a) for additional requirements for ignitable, reactive or incompatible wastes.	
(725.277)	Is the owner/operator complying with the requirements concerning incompatible wastes? Yes _____ No _____ N/A _____ COMMENTS:	
(725.278)	Section 725.278 Air Emission Standards Is the owner or operator managing all hazardous waste placed in containers in accordance with Subparts AA, BB and CC of Part 725? Yes _____ No _____ N/A <input checked="" type="checkbox"/> Comments: Does the generator accumulate and/or treat hazardous waste in tanks? Yes _____ No _____ N/A <input checked="" type="checkbox"/> Note: If "No", go to Subpart C.	
	SUBPART J: TANK SYSTEMS	
	Has the generator closed an accumulation area? Yes _____ No <input checked="" type="checkbox"/> N/A _____	725.211
(725.211) (725.214)	If "Yes", was the accumulation area closed in accordance with Sections 725.211 and 725.214? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	725.214

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(725.290)	<p>Does the facility accumulate or treat hazardous waste in tanks? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Note: A generator may treat hazardous waste in a tank for less than 90 days without a RCRA permit.</p> <p>If "No", skip Subpart J.</p> <p>a) Tank systems that are used to accumulate or treat hazardous waste which contains no free liquids (using the Paint Filter Liquids Test) and that are situated inside a building with an impermeable floor are exempted from the requirements in Section 725.293.</p> <p>b) Tank systems, including sumps, that serve as part of a secondary containment system to collect or contain releases of hazardous wastes are exempted from the requirements in Section 725.293(a).</p> <p>c) Tanks, sumps and other collection devices used in conjunction with drip pads (as defined in Section 720.110) and regulated under Subpart W, must meet the requirements of this Subpart.</p>	
(725.291(a))	<p>For tanks existing prior to July 14, 1986 (see definition of tank system under 720.110) and not protected by a secondary containment system, has a written assessment been reviewed and certified by an IRPE(*) in accordance with Section 702.126(d) by January 12, 1988 [except as provided in Section 725.291(c)]? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.291(b))	<p>Does this assessment consider at least the following:</p> <p>1) design standards for the tank and ancillary equipment? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>2) hazardous characteristics of the wastes? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>3) existing corrosion protection measures? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>4) documented age of the tank system? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>5) results of a leak test, internal inspection, or other tank integrity examination? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>*IRPE = Independent Registered Professional Engineer</p>	No Tank Assessment
(725.291(c))	<p>Has a tank system assessment been performed within 12 months after the materials in the tank become a hazardous waste? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>Note: If an assessment indicates a tank system is leaking or unfit for use, the owner/operator must comply with the requirements of Section 725.291(b)(5).</p>	

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(725.292(a))	<p>For new tanks (see definition of new tanks under Section 720.110) whose installation commenced after 07/14/86, has a written assessment been reviewed and certified by an IRPE in accordance with Section 702.126(d) prior to operation of the tank system?</p> <p>Yes _____ No <input checked="" type="checkbox"/> N/A _____</p> <p>Does the assessment include, at a minimum, the following:</p> <p>1) design standards for tanks and ancillary equipment? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>2) hazardous characteristics of the waste(s) to be handled? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>3) evaluation of potential for corrosion and corrosion protection measures for tank systems with metal components in contact with soil or water? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>4) design or operational measures that will protect underground tank systems from potential damage resulting from vehicular traffic? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>5) designs to ensure adequate foundations, anchoring to prevent flotation or dislodgment and the ability to withstand the effects of frost heave? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	No tank Assessment
(725.292(g))	<p>Has the owner/operator obtained and kept on file at the facility the written statements, including the certification statements [as required in Section 702.126(d)] of the design and installation requirements of Subsections (b) through (f)?</p> <p>Yes _____ No <input checked="" type="checkbox"/> N/A _____</p>	
(725.293(a))	<p>Is secondary containment provided for any new tank system before being put into service? Yes _____ No _____ N/A _____</p> <p>Does an existing tank, used to accumulate F020, F021, F022, F023, F026 or F027 waste(s), have secondary containment by 1/12/89? Yes _____ No _____ N/A _____</p> <p>For an existing tank of documentable age, is secondary containment provided by 1/12/89 or when the tank is 15 years old, whichever is later? Yes _____ No _____ N/A _____</p> <p>For an existing tank of undocumentable age, has secondary containment been provided by 1/12/95? Yes _____ No _____ N/A _____</p> <p>or if the facility is older than 7 years, by the time the facility reaches 15 years of age or 1/12/89, whichever is later? Yes _____ No _____ N/A _____</p> <p>For tanks that accumulate wastes that become hazardous after 1/12/87, has secondary containment been provided within the time intervals required in Subsections (a)(1) through (a)(4) substituting the date that a material becomes a hazardous waste for 1/12/87? Yes _____ No _____ N/A _____</p>	Insufficient information
(725.293(b))	<p>Is the secondary containment system designed, installed and operated to prevent migration of wastes or accumulated liquid out of the system at any time? Yes _____ No _____ N/A _____</p> <p>Is the secondary containment system capable of detecting and collecting releases and accumulated liquids until the collected material is removed? Yes _____ No _____ N/A _____</p>	

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(725.293(c))	<p>To meet the requirements of Subsection (b), is the secondary containment system:</p> <p>1) compatible with the waste(s) in the tank and of sufficient strength and thickness to prevent failure? Yes _____ No _____ N/A _____</p> <p>2) placed on a foundation or base capable of providing support, providing resistance to pressure gradients and preventing failure due to settlement, compression or uplift? Yes _____ No _____ N/A _____</p> <p>3) provided with a leak detection system designed and operated to detect any release or accumulated liquid within 24 hours? Yes _____ No _____ N/A _____</p> <p>4) sloped or otherwise designed or operated to drain and remove liquids resulting from leaks, spills or precipitation? Yes _____ No _____ N/A _____</p> <p>and is spilled or leaked waste and accumulated precipitation removed from the secondary containment within 24 hours? Yes _____ No _____ N/A _____</p> <p>Note: A RCRA permit may allow for removal of liquids less frequently than 24 hours after accumulation.</p>	<p><i>Insufficient Information</i></p>
(725.293(d))	<p>Does the secondary containment for tanks have one or more of the following:</p> <p>1) a liner (external to the tank); or 2) a vault; or 3) a double-walled tank; or 4) an equivalent device (approved by the Board)? Yes _____ No _____ N/A _____</p>	
(725.293(e))	<p>Does the external liner system(s), vault system(s) and/or double-walled tank(s) meet the additional requirements identified in Section 725.293(c)? Yes _____ No _____ N/A _____</p>	
(725.293(f))	<p>Is ancillary equipment protected by secondary containment that meets the requirement of Subsection (h) and (c)? Yes _____ No _____ N/A _____</p> <p>If "No":</p> <p>1) Is aboveground piping (exclusive of flanges, joints, valves and connections) inspected daily? Yes _____ No _____ N/A _____</p> <p>2) Are welded flanges, joints and connections inspected daily? Yes _____ No _____ N/A _____</p> <p>3) Are sealless or magnetic coupling pumps and sealless valves inspected daily? Yes _____ No _____ N/A _____</p> <p>4) Are pressurized aboveground piping systems with automatic shut-off devices inspected daily? Yes _____ No _____ N/A _____</p>	
(725.293(i))	<p>Until such time as secondary containment is provided, are the following requirements being met for all tank systems:</p> <p>1) For non-enterable underground tanks, has an annual leak test that meets the requirements of 725.291(b)(5) been conducted? Yes _____ No _____ N/A _____</p> <p>2) For other than non-enterable underground tanks and ancillary equipment, has an annual leak test, internal inspection or other tank integrity examination by an IRPE been conducted? Yes _____ No _____ N/A _____</p> <p>3) Are written records maintained at the facility to document the assessments required under Subsections (i)(1) and (i)(2)? Yes _____ No _____ N/A _____</p> <p>Note: If a tank system is found to be leaking or unfit for use as a result of a leak test or assessment, the owner/operator must comply with Section 725.296.</p>	

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(725.294(a))	Has the owner/operator placed hazardous wastes or treatment reagents in the tank system that could cause the system to rupture, leak, corrode or otherwise fail? Yes _____ No _____ N/A _____	
(725.294(b))	Do tanks and secondary containment have appropriate controls and practices to prevent spills and overflows including: 1) spill prevention controls? Yes _____ No _____ N/A _____ 2) overflow prevention controls? Yes _____ No _____ N/A _____ 3) sufficient freeboard in uncovered tanks? Yes _____ No _____ N/A _____	↑ Insufficient Information ↓
(725.294(c))	Note: If a leak or spill has occurred in the tank system, the owner/operator shall comply with the requirements of Section 725.296.	
(725.295(a))	Does the owner/operator inspect, if present, at least each operating day, the following: 1) overflow/spill control equipment? Yes _____ No <input checked="" type="checkbox"/> N/A _____ 2) the aboveground portion of the tank system for corrosion or releases? Yes _____ No <input checked="" type="checkbox"/> N/A _____ 3) data from monitoring equipment? Yes _____ No <input checked="" type="checkbox"/> N/A _____ 4) the construction materials and the area immediately surrounding the external portion of the system? Yes _____ No <input checked="" type="checkbox"/> N/A _____	
(725.295(b))	If the tank system has cathodic protection, is the owner/operator complying with Section 725.295(b) to ensure that they are functioning properly? Yes _____ No _____ N/A _____	
(725.295(c))	Does the owner/operator document in the operating record, the results of tank inspections as required in Section 725.295(a) and (b)? Yes _____ No <input checked="" type="checkbox"/> N/A _____	
(725.296)	If the tank system or secondary containment system has a leak or spill or is unfit for use, has the owner/operator: a) immediately ceased using; prevented flow or addition of waste and inspected the system to determine the cause of the release? Yes _____ No _____ N/A _____ b) removed applicable waste from the system within 24 hours of detection? Yes _____ No _____ N/A _____ c) immediately conducted a visual inspection of the release and taken actions to contain visible releases to the environment, prevented further migration to soils or surface water and removed and properly disposed of any contaminated soil or water? Yes _____ No _____ N/A _____	Insufficient Information
(725.296(d))	d) notified the Agency within 24 hours of detection of release? Yes _____ No _____ N/A _____ d3) within 30 days of detection of release, submitted a report to the Agency that complies with the requirements of Section 725.296(d)(3)? Yes _____ No _____ N/A _____ Note: Notification and reports are not necessary if less than 1 pound of material is spilled and it was immediately contained and cleaned up.	↓

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(725.296(e))	<p>e) repaired the tank system prior to returning the tank system to service in the event that a leak has occurred from the primary tank system into the secondary containment system? Yes _____ No _____ N/A _____</p> <p>e)4) provided secondary containment before returning a tank system to service in the event that the release was from a component of a tank system without secondary containment? Yes _____ No _____ N/A _____</p> <p>e)4) met the requirements for a new tank system in the event that a component is replaced during repair? Yes _____ No _____ N/A _____</p> <p>e)4) provided the entire component with secondary containment prior to being returned to use in the event that a leak has occurred in any portion of a component that is not readily accessible for visual inspection? Yes _____ No _____ N/A _____</p>	Insufficient Information
(725.296(f))	<p>f) In the event that an extensive repair has been conducted in accordance with subsection (e), submitted to the Agency within 7 days after returning the tank system to use, a certification by an IRPE stating that the repaired system is capable of handling hazardous wastes without release for the intended life of the system? Yes _____ No _____ N/A _____</p> <p>Note: If the owner/operator does not satisfy the requirements of subsections (e)(2) through (e)(4), the tank system must be closed in accordance with Section 725.297.</p>	
(725.297(a))	<p>At the time of closure of a tank system, has the owner/operator removed or decontaminated all waste residues, contaminated components, contaminated soils and structures and equipment and managed them as hazardous waste [unless Section 721.103(d) applies]? Yes _____ No _____ N/A _____</p>	
(725.297(a))	<p>Have the closure plan, closure activities, cost estimates for closure and financial responsibility for tank systems met all requirements specified in Subparts G and H? Yes _____ No _____ N/A _____</p>	
(725.297(b))	<p>If the tank system cannot be "clean" closed, has the owner/operator closed the tank system and performed post-closure care in accordance with the closure and post-closure care requirements that apply to landfills (Section 725.410)? Yes _____ No _____ N/A _____</p> <p>Note: Such a tank system is considered a landfill and must meet all of the requirements of landfills specified in Subparts G and H.</p>	
(725.298(a))	<p>Are ignitable or reactive wastes placed in a tank system? Yes _____ No _____ N/A _____</p> <p>If "No", skip to Section 725.299.</p> <p>Is the waste treated, rendered or mixed before or immediately after placement in the tank system so that:</p> <ul style="list-style-type: none"> - the resulting waste, mixture or dissolved material is no longer ignitable or reactive? Yes _____ No _____ N/A _____ - Section 725.117(b) is complied with? Yes _____ No _____ N/A _____ <p>or</p> <p>Is the waste accumulated or treated so that it is protected from any material or conditions which may lead to ignition or reaction? Yes _____ No _____ N/A _____</p> <p>or</p> <p>Is the tank used solely for emergencies? Yes _____ No _____ N/A _____</p>	✓

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(725.298(b))	Is the facility complying with the requirements regarding maintenance of protective distances between the waste management area and any public ways, streets, alleys or any adjoining property line? Yes _____ No _____ N/A _____	
(725.299)	Are incompatible wastes/materials placed in the same tank? Yes _____ No _____ N/A _____ If "No", skip to Section 725.300. Is Section 725.117(b) being complied with? Yes _____ No _____ N/A _____ Has the tank system been properly decontaminated if it previously held an incompatible waste/material unless Section 725.117(b) is complied with? Yes _____ No _____ N/A _____ COMMENTS:	↑ Insufficient Information ↓
(725.302)	Section 725.302 Air Emission Standards Is the owner or operator managing all hazardous waste placed in tanks in accordance with Subparts AA, BB and CC of Part 725? Yes _____ No _____ N/A <input checked="" type="checkbox"/> Comments:	
(725.131)	SUBPART C: PREPAREDNESS AND PREVENTION Is the facility being operated and maintained to minimize the possibility of a fire, explosion or any release of hazardous waste or hazardous waste constituents which could threaten human health or the environment? Yes <input checked="" type="checkbox"/> No _____ N/A _____	
(725.132)	Is the facility equipped with the following, if necessary: a) an internal communication or alarm system(s)? Yes <input checked="" type="checkbox"/> No _____ N/A _____ b) a telephone or other device to summon emergency assistance from local authorities? Yes <input checked="" type="checkbox"/> No _____ N/A _____ c) portable fire extinguishers, fire control equipment, spill control equipment and decontamination equipment? Yes <input checked="" type="checkbox"/> No _____ N/A _____ d) water at adequate volume and pressure for fire control? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	
(725.133)	Is the facility testing and maintaining communication/alarm system(s), fire protection equipment, spill control equipment and decontamination equipment? Yes <input checked="" type="checkbox"/> No _____ N/A _____	
(725.134)	a) Where hazardous waste is being handled, do all employees have immediate access to an internal alarm or other emergency communication device? Yes <input checked="" type="checkbox"/> No _____ N/A _____ b) If there is ever just one employee on the premises when the facility is operating, does he/she have immediate access to a device capable of summoning external emergency assistance? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	
(725.135)	Is the facility maintaining adequate aisle space? Yes <input checked="" type="checkbox"/> No _____ N/A _____	

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(725.137)	<p>Has the facility attempted to make the following arrangements, as appropriate, for the type of facility and waste:</p> <ul style="list-style-type: none"> - arrangements with local emergency authorities (i.e. police and fire departments, other emergency response agencies) to familiarize them with the layout of the facility, properties of hazardous waste handled, places where facility personnel would be working, entrances to roads inside the facility and evacuation routes? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - agreements designating the primary authority where more than one police or fire department might respond? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - agreements with State emergency response teams/contractors and equipment suppliers? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the type of injuries or illnesses which could result from fires, explosions or releases at the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 	
(725.151(a))	<p>SUBPART D: CONTINGENCY PLAN AND EMERGENCY PROCEDURES</p> <p>Is the contingency plan available? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>If "No", skip to Section 725.155.</p> <p>Is the plan designed to protect human health and the environment from releases to the air, soil and water? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.151(b))	<p>Has there been a fire, explosion or release of hazardous waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>If "Yes", has the contingency plan been carried out immediately? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.152(a))	<p>Does the plan describe the actions required for response to:</p> <ul style="list-style-type: none"> - fires? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - explosions? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - releases? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 	
(725.152(c))	<p>Does the plan describe arrangements with:</p> <ul style="list-style-type: none"> - police and fire departments? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - hospitals? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - contractors? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - emergency response teams? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 	
(725.152(d))	<p>Does the plan contain the current emergency coordinator's name, phone (office and home) and address? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.152(e))	<p>Does the plan identify all emergency equipment including:</p> <ul style="list-style-type: none"> - description? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - capability? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - location? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> <p>Is the list of emergency equipment up-to-date? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.152(f))	<p>Does the plan include:</p> <ul style="list-style-type: none"> - an evacuation plan? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - an evacuation signal? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - alternate evacuation routes? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 	

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Date of Inspection:
July 15, 2015

Location Address:
1390 Lunt Ave, Elk Grove Village, IL
U.S. EPA Inspector:
Graciela Scambiaterra

EPA ID Number:
ILD 074 367 251

Attachment 2

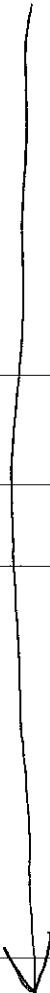
Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.153)	<p>Has the contingency plan (including all revisions) been: <input checked="" type="checkbox"/></p> <p>a) maintained at the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>b) submitted to:</p> <p>- police department? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>- fire department? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>- hospital? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>- emergency response teams? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.154)	<p>Has the contingency plan been reviewed and revised whenever:</p> <p>a) regulations are revised? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>b) the plan fails in an emergency? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>c) the facility changes in a way that modifies the emergency response necessary? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>d) information regarding emergency coordinators changes? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>e) information regarding equipment changes? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.155)	<p>Is the emergency coordinator on-site or on call at all times? <input checked="" type="checkbox"/></p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Is the emergency coordinator familiar with all facility activities, wastes, records, layout and contingency plan? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Does the emergency coordinator have the authority to commit the resources needed to carry out the actions specified in the contingency plan? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.156)	<p>If the facility has had a release, fire or explosion, have the procedures of this Section been followed regarding assessment, response and reporting? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Note: If the facility has had a release, explain in detail.</p>	

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Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.116(a))	<p>Section 725.116 Personnel Training Does the facility have a training program? Yes _____ No _____ N/A _____</p> <p>Have facility personnel successfully completed a program of classroom or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the requirements of Part 725? Yes _____ No _____ N/A _____</p> <p>Is the program directed by a person trained in hazardous waste management procedures? Yes _____ No _____ N/A _____</p> <p>Does the program teach facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed? Yes _____ No _____ N/A _____</p> <p>Does the program cover, at a minimum:</p> <ul style="list-style-type: none"> - procedures to familiarize facility personnel with emergency procedures, emergency equipment and emergency systems? Yes _____ No _____ N/A _____ - procedures for using, inspecting, repairing and replacing facility emergency and monitoring equipment? Yes _____ No _____ N/A _____ - key parameters for automatic waste feed cut-off systems? Yes _____ No _____ N/A _____ - communications or alarm systems? Yes _____ No _____ N/A _____ - response to fire or explosions? Yes _____ No _____ N/A _____ - response to groundwater contamination incidents? Yes _____ No _____ N/A _____ - shutdown of operations? Yes _____ No _____ N/A _____ 	<p><i>See Inspection Report</i></p> 
(725.116(b))	<p>Have new employees completed the program within 6 months of the date of employment or assignment to a position requiring them to manage hazardous waste? Yes _____ No _____ N/A _____</p>	
(725.116(c))	<p>Have facility personnel received an annual review of the initial training? Yes _____ No _____ N/A _____</p>	
(725.116(d))	<p>Are the following documents and records being maintained at the facility:</p> <ol style="list-style-type: none"> 1) the job title for each position related to hazardous waste management and the name(s) of the employee(s) filling each job? Yes _____ No _____ N/A _____ 2) a written job description for each position above, including the requisite skill, education or other qualifications and duties of personnel assigned to each position? Yes _____ No _____ N/A _____ 3) a written description of the type and amount of both initial and continuing training that will be given to each person filling a position dealing with hazardous waste management? Yes _____ No _____ N/A _____ 4) records documenting that the training or job experience has been given to and completed by facility personnel? Yes _____ No _____ N/A _____ 	
(725.116(e))	<p>Is the facility maintaining training records until closure of the facility and those of former employees for at least 3 years from the last date of employment? Yes _____ No _____ N/A _____</p>	

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Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(728.107(a)(5))	Section 728.107 Waste Analysis and Recordkeeping Has the generator who treats a prohibited waste in tanks or containers in order to meet the treatment standards developed and followed a waste analysis plan? Yes _____ No _____ N/A <input checked="" type="checkbox"/> Is the plan on-site? Yes _____ No _____ N/A <input checked="" type="checkbox"/> Does the plan include a detailed physical and chemical analysis? Yes _____ No _____ N/A <input checked="" type="checkbox"/> Has the plan been filed with the Agency at least 30 days prior to commencement of treatment activity? Yes _____ No _____ N/A <input checked="" type="checkbox"/> Has the generator submitted the required notification and certification that the waste meets treatment standards when the waste is shipped off-site? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	
722.134(c)	Section 722.134 Satellite Accumulation Is the generator who accumulates hazardous waste at or near any point of generation where wastes initially accumulate and which is under the control of the operator of the process generating the waste, limiting such accumulation to 55 gallons of hazardous waste or 1 quart of acutely hazardous waste, complying with Sections 725.271, 725.272 and 725.273(a), and marking the containers with the words "Hazardous Waste" or other words identifying the contents? Yes _____ No <input checked="" type="checkbox"/> N/A _____ Has the generator who accumulates more than 55 gallons of hazardous waste or 1 quart of acutely hazardous waste complied with the requirements of Section 722.134(a) within 3 working days? Yes _____ No _____ N/A <input checked="" type="checkbox"/> If there are more than 55 gallons of hazardous waste or 1 quart of acutely hazardous waste in the satellite accumulation area, are the containers marked with the date accumulation began? Yes _____ No _____ N/A <input checked="" type="checkbox"/> During the 3 day period, is the generator continuing to comply with the requirements of Section 722.134(c)(1) with respect to the excess waste? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	
722.134(g)	Note: A generator that generates 1,000 kilograms or greater of hazardous waste per calendar month which also generates wastewater treatment sludges from electroplating operations that meet the listing description for the hazardous waste code F006 may have alternate accumulation requirements if the conditions of 722.134(g), (h), or (i) are fulfilled.	
	SUBPART D: RECORDKEEPING AND REPORTING Section 722.140 Recordkeeping	
722.140(a)	Has the generator retained for a period of 3 years: - a copy of each signed manifest? Yes _____ No <input checked="" type="checkbox"/> N/A _____	722.140(a)
722.140(b)	Has the generator retained a copy of each Annual Report and Exception Report for a period of at least three years from the due date of the report (March 1)? Yes _____ No <input checked="" type="checkbox"/> N/A _____	722.140(b)
722.140(c)	Has the generator retained for a period of 3 years: - copies of test results, waste analyses or other determinations made in accordance with Section 722.111? Yes _____ No _____ N/A _____	722.140(c)
722.140(d)	Does a generator who is involved in any unresolved enforcement action or as requested by the Director continue to maintain the records required in subsections a) and c)? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	722.140(d)

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Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
722.141(a)	Section 722.141 Annual Reporting Has the generator who ships hazardous waste off-site for treatment, storage or disposal filed an annual report with the Agency by March 1 for the preceding calendar year? <u>Yes</u> <input checked="" type="checkbox"/> <u>No</u> <input type="checkbox"/> <u>N/A</u> <input type="checkbox"/> Note: If "No", or if deficiencies are noted with the annual report reviewed, contact the Planning and Reporting Section.	722.141(a)
722.141(b)	Has the generator who treats, stores or disposes of hazardous waste on-site, filed an annual report with the Agency by March 1 for the preceding calendar year? <u>Yes</u> <input type="checkbox"/> <u>No</u> <input type="checkbox"/> <u>N/A</u> <input type="checkbox"/>	722.141(b)
722.142(a)(1)	Section 722.142 Exception Reporting If the generator has not received a copy of the manifest from the TSD facility within 35 days of the date of delivery to the transporter, has the generator contacted the transporter or the TSD facility to determine the status of the hazardous waste? <u>Yes</u> <input type="checkbox"/> <u>No</u> <input type="checkbox"/> <u>N/A</u> <input type="checkbox"/>	722.142(a)(1)
722.142(a)(2)	If the generator has not received a copy of the signed manifest within 45 days of the date of delivery to the transporter, has he filed an exception report with the Agency in accordance with the requirements of this Section? <u>Yes</u> <input type="checkbox"/> <u>No</u> <input checked="" type="checkbox"/> <u>N/A</u> <input type="checkbox"/>	722.142(a)(2)
722.143	Section 722.143 Additional Reporting Has the generator furnished additional reports as required by the Director? <u>Yes</u> <input type="checkbox"/> <u>No</u> <input type="checkbox"/> <u>N/A</u> <input checked="" type="checkbox"/>	722.143
722.150	SUBPART E: EXPORTS OF HAZARDOUS WASTE Is the generator an exporter of hazardous waste? <u>Yes</u> <input type="checkbox"/> <u>No</u> <input type="checkbox"/> <u>N/A</u> <input checked="" type="checkbox"/> If "Yes", has the generator complied with the requirements of Subpart E? <u>Yes</u> <input type="checkbox"/> <u>No</u> <input type="checkbox"/> <u>N/A</u> <input checked="" type="checkbox"/>	722.150
722.160	SUBPART F: IMPORTS OF HAZARDOUS WASTE Is the generator an importer of hazardous waste? <u>Yes</u> <input type="checkbox"/> <u>No</u> <input type="checkbox"/> <u>N/A</u> <input checked="" type="checkbox"/> If "Yes", has the generator complied with the requirements of Subpart F? <u>Yes</u> <input type="checkbox"/> <u>No</u> <input type="checkbox"/> <u>N/A</u> <input checked="" type="checkbox"/>	722.160
722.170	SUBPART G: FARMERS Is the generator a farmer? <u>Yes</u> <input type="checkbox"/> <u>No</u> <input type="checkbox"/> <u>N/A</u> <input checked="" type="checkbox"/> If "Yes", has the generator complied with the requirements of Subpart G? <u>Yes</u> <input type="checkbox"/> <u>No</u> <input type="checkbox"/> <u>N/A</u> <input type="checkbox"/>	722.170